OEB Multi Year Incentive Rate Regulation for Natural Gas Utilities

EB-2006-0209

Submissions of TransCanada PipeLines Limited



Principles



- Multi-year Incentive Regulations must respect the regulatory principle that rates be just and reasonable
- Just and reasonable rates should generally reflect underlying costs (cost causation principle)
- Functions that are anticipated to have different cost profiles should have different rate escalators
- Cost expectations should be examined separately, then the appropriate escalator for each function should be decided





Transmission and Distribution Capital Expenditures Profiles are Dissimilar

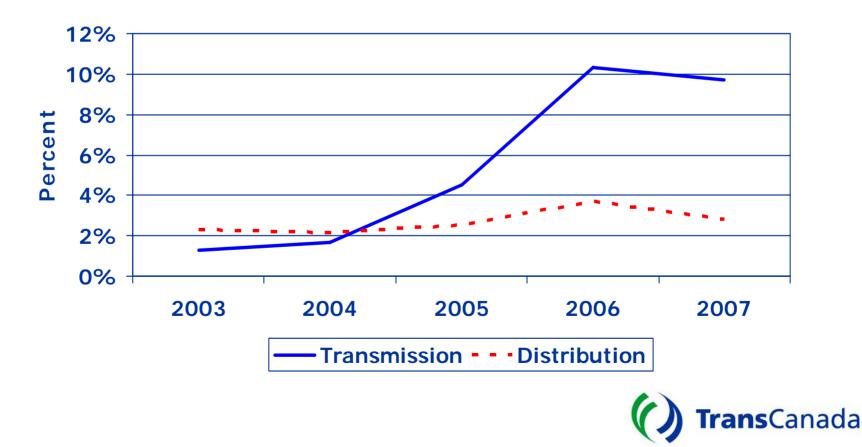
- •Transmission:
 - Capital Expenditures are highly variable from yearto-year, depending on capacity additions (ranged from 1.3% to 10.3% as a percentage of Union's transmission GPIS)
 - Reflect impact of "lumpy" capital additions and nature of the addition (i.e., mains or compression)
- Distribution:
 - Much more predictable and less variable from year to year (additions ranged from 2.1% to 3.7% of Union's distribution GPIS)



Capital Expenditures by Functions (con't)



Capacity addititions as a Percentage of GPIS by Function



Forecast Transmission Capacity Additions of Union Gas Limited (Union)



- Union expects major capacity additions over the next five years
- Unlike recent additions, which have been relatively expensive, future expansions are expected to be relatively low cost
- Future rates should reflect the expected addition of relatively low cost transmission facilities. This can be done by:
 - Applying separate escalator to transmission; or
 - Making transmission capacity additions a Z factor



Union's Transmission Facilities Expansion Program



Year	Design Capacity Added (TJ/d)	Facility Capital Cost (\$million)	Cost per Unit of Capacity added (\$/GJ/D)
2006	384	149.4	388.8
2007	492	101.3	205.9
2008	349	47.3	135.7
2009	300	48.3	161.1
2010	-	-	-
2011	228	57.5	252.0
Total	1,753	403.9	230.4

